

1 LAW OFFICES OF JOHN A. HAUSER
2 By: LAURIE J. ELZA, State Bar No.: 284903
One Pointe Drive, 6th Floor,
3 Brea, CA 92821
Phone: (714) 571-0407 / Fax: (877) 369-5799
4 Direct Line: (714) 371-2311
E-Mail: laurie.elza@thehartford.com
5 **Mailing Address:** P.O. Box 2282, Brea, CA 92822-2282

6 LEWIS BRISBOIS BISGAARD & SMITH, LLP
7 By: ANDREW C. HUBERT, State Bar No.: 117887
By: DANA A. FOX, State Bar No.: 119761
8 633 W. 5th Street, Ste. 4000
Los Angeles, CA 90071
9 Phone: (213) 580-6337 / F: (213) 250-7900
10 E-Mail: andrew.hubert@lewisbrisbois.com; dana.fox@lewisbrisbois.com

11 Attorneys for Defendant, PA SOLUTIONS, INC.
12

13 UNITED STATES DISTRICT COURT

14 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 CAMERON DYESS, an individual,

CASE NO. 4:20-cv-00909-HSG
*[Assigned for All Purposes to the Honorable
Haywood S. Gilliam, Jr.; Courtroom 2]*

17 Plaintiff,

19 vs.

20
21 **STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINE TO
MEDIATE AND USE OF PRIVATE
MEDIATOR & ORDER THEREON
(as modified)**

22 ESTATE OF JAJUAN LEE MORTON,
Deceased; DONYELL SHAJUAN
HANKINS as Personal Representative of
the ESTATE OF JAJUAN LEE MORTON,
Deceased; PA SOLUTIONS, INC., a
Michigan Corporation; and DOES 1 through
20, inclusive,

Action Filed: November 22, 2019
Trial Date: November 8, 2021

26 Defendants.

27 ///

1 Plaintiff Cameron Dyess and Defendants Estate of Jajuan Lee Morton and PA Solutions,
 2 Inc. (collectively “the Parties”), submit this stipulation to extend the deadline to mediate this
 3 matter, subject to the Court’s approval, as follows:

4 On May 15, 2020, the Court issued an Order Selecting ADR Process (Document 29), as
 5 follows:

EVENT	DATE
Mediation Deadline	February 1, 2021

9 The Parties agree and stipulate that the discovery necessary to prepare this matter for
 10 mediation was not able to be completed by the above deadline. The Parties further agree and
 11 stipulate that the delay in discovery is due to events beyond the parties’ control and which,
 12 despite their best efforts, cannot be rectified. The delays are due to the COVID pandemic and the
 13 multi-state locations of the Parties and medical providers. These delays include the inability to
 14 obtain complete medical records and billing, which adversely impacts the Parties’ ability to
 15 retain experts and to schedule depositions of medical providers, as well as ongoing document
 16 discovery between the parties, which will necessitate depositions of party representatives and
 17 employee witnesses which are currently scheduled for March 2021.

18 The Parties agree and stipulate that an extension of the deadline to mediate is needed to
 19 permit the Parties to complete the discovery necessary for mediation.

20 The Parties further agree and stipulate to the use of a private mediator and removal from
 21 the court-sponsored mediation.

22 The Parties agree and stipulate that this stipulation is made in good faith in the interests
 23 of judicial economy and efficiency of resources of the Court and the Parties and is not for the
 24 purposes of delay.

25 IT IS STIPULATED AND AGREED, by and between the parties and their undersigned
 26 counsel of record, that the deadline to mediate be moved to August 1, 2021, and that this matter
 27 be removed from the court-sponsored mediation program and referred to private mediation.

1
2 DATED: February 26, 2021
3

ERSKINE LAW, PC

4 BY: /s/ Jonathan M. Shugart
5 JONATHAN M. SHUGART, ESQ.
6 Attorneys for Plaintiff, CAMERON DYESS

7 DATED: February 26, 2021
8

LAW OFFICES OF JOHN A. HAUSER

9 BY: /s/ Laurie J. Elza
10 LAURIE J. ELZA, ESQ.
11 Attorneys for Defendant, PA SOLUTIONS, INC.

12 DATED: February 26, 2021
13

LEWIS BRISBOIS BISGAARD & SMITH, LLP

14 BY: /s/ Andrew C. Hubert
15 ANDREW C. HUBERT, ESQ.
16 Co-Counsel for Defendant, PA SOLUTIONS, INC.

DATED: February 26, 2021
17

KNUDTSON & ASSOCIATES, PC

18 BY: /s/ Gigi Knudtson
19 GIGI KNUDTSON, ESQ.
20 Attorneys for Defendant, ESTATE OF JAJUAN
LEE MORTON

21 ORDER
22

23 **IT IS SO ORDERED** that in light of this stipulation, the Court sets aside its previous
24 order referring the case to court-connected mediation (docket no. 29). The parties are directed
25 to complete private mediation by August 1, 2021.

26 DATED: 3/1/2021
27


HON. HAYWOOD S. GILLIAM, JR. UNITED
STATES DISTRICT COURT JUDGE